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Attorneys for the Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	No. 3:10-cr-00086-TMB
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
JESUS ALBERTO AYALACORIA,	)	
	)	
Defendant.	)	
	)	

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**SUPPLEMENT TO RESPONSE IN OPPOSITION TO “MOTION FOR  
COMPASSIONATE RELEASE PURSUANT TO 18 U.S.C. § 3582(C)(1)(A)”**

In its response opposing the defendant’s motion for compassionate release, ECF No. 130, the government asserted that the defendant had not requested compassionate release through the Bureau of Prisons. That claim was incorrect: BOP has since informed the government that the defendant did submit a request for compassionate release to BOP on May 18, 2020. The warden has not issued a response. The defendant has therefore not yet

“fully exhausted all administrative rights to appeal a failure of the Bureau of Prisons to bring a motion” requesting compassionate release on his behalf: he must either do so, or wait until 30 days has passed from his first request, before bringing this matter to court. 18 U.S.C. § 3582(c)(1)(A). *United States v. Alam*, --- F.3d ---, 2020 WL 2845694 (6th Cir. June 2, 2020). Accordingly, the Court still lacks jurisdiction to hear his claim at the present time. Moreover, denial of the request remains appropriate for the reasons set forth in the original response.

RESPECTFULLY SUBMITTED this 8th day of June, 2020, in Anchorage,  
Alaska.

BRYAN SCHRODER  
United States Attorney

s/ Stephen Corso  
STEPHEN CORSO  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2020 a true and correct copy of the foregoing was served electronically on the following:

Daniel Poulson

s/ Stephen Corso  
Office of the U.S. Attorney